

WWR# 040426402

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
ROBERT LEE BOLTZ  
LINDA L BOLTZ

Debtors

PSECU

Movant

CASE NO. 18-16837-elf

CHAPTER 13

**Hearing Date: 9/12/2019**

**Hearing Time: 11:00 a.m.**

**REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtor produces for inspection by the undersigned attorney for the Movant the following:

1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
  - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the payment due on 4/22/2019 through 7/22/2019, was tendered to Movant.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Brian Langford  
Brian Langford  
Weltman, Weinberg & Reis Co., L.P.A.  
436 7th Avenue Ste 2500  
Pittsburgh, PA 15219  
(412) 338-7102  
Attorney for Movant